

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the matter of  
Modernizing the E-Rate program for Schools and Libraries  
CC Docket No. 02-06  
Comments on Category Two Budgets  
WC Docket No.13- 184

**Comments of Janice Meyers Educational Consulting, LLC**

Janice Meyers began her E-Rate career as the Technology Director of Leake and Watts Services, Inc., Yonkers, NY in 2001. She was tasked with learning and filing for E-Rate funding, as well as keeping the agency CIPA compliant, writing the technology plan, creating staff development programs for teachers and staff, and overseeing the Educational Technology Curriculum. Since then, her company, Janice Meyers Educational Consulting, LLC, has grown to serve Special Education and Residential Treatment Centers, Charter Schools, small independent and private schools, and large public school districts. Ms. Meyers has ten years as a consultant in business forms and systems analysis, ten years in education as a classroom teacher, and ten years as a school Director of Technology. Janice Meyers Educational Consulting, LLC is an active certified member of E-mpa and SHLB.

I applaud the commission on the adoption of the E-Rate Modernization Report and Order and Further Notice of Proposed Rulemaking, and Second E-Rate Modernization Report and Order and Order on Reconsideration. The commission has put the “Universal” back into the Universal Service Fund. These orders have opened the doors for school below the 85% discount rate to realize the advantages of C2 funding by providing enough Category Two funds to serve every school that applies.

Unfortunately, the new rules have had unwanted consequences.

**\$150.00/student over 5 years is not enough to fully fund a Wi-Fi network**

1. Leake and Watts Services, Inc. has participated in the E-Rate program since 1997. E-Rate has been invaluable to the agency, providing enough funding to build a network

and provide eligible services to students and staff. When the 2013 and 2014 C2 applications were not funded the agency suffered. With the implementation of the 7<sup>th</sup> order requiring a per student budget by entity, Leake and Watts Services, Inc. has been forced to limit the application requests not by need, but by dollar amount. Because the basic cap of \$9,200 is too minimal, sites that require a basic Wi-Fi network, special education schools and Head Start/Universal Pre-K's cannot fully create a Wi-Fi network that can service both students and staff. The amount of \$9,200 can fund a firewall, and 3 WAPs and some installation, but will not fund the required POE switches and cabling. Leake and Watts Services, Inc. published an RFP for network upgrades for firewalls, switches, and WAPS for 6 schools in 7 locations. The winning bid was \$397,128. The school was funded for \$114,247. The E-Rate budget would not support any of the switches, project management, cabling, and installation. Leake and Watts Service, Inc. currently serves 64 residential foster care students (the capacity is 200 students) in 7 cottages located on 80 acres in Yonkers, NY. The cottages are connected by a fiber link and have some Ethernet cabling for computers to connect to the WAN. There is no Wi-Fi network or internet access for students when they return home to the cottage from school. This puts these students at a disadvantage compared to their peers. They cannot access the internet for homework, research, or independent study.

The 6<sup>th</sup> Order amended previous orders to:

“We adopt our proposal to allow residential schools that serve unique populations – schools on Tribal lands; schools designed to serve students with medical needs; schools designed to serve students with physical, cognitive or behavioral disabilities; schools where 35 percent or more of their students are eligible for the national school lunch program;<sup>94</sup> or juvenile justice facilities – **to receive E-rate funding for all supported services provided in the residential areas of those schools.**<sup>95</sup> We find that, because these schools also serve as residences to the students, the supported E-rate services will be used primarily, if not exclusively, for educational purposes, and thus support is consistent with our rules and with the purposes of section 254.<sup>96</sup>”

The 7<sup>th</sup> Order and Report has not included a way to support this order.

2. Whitney Hall School- The Children's Center of Hamden serves 67 emotionally disturbed students at the Raymond Hill School. The agency is located on 10 acres with 7 buildings to serve the school, the clinicians, and the residences. This entity has received E-Rate funding since 2004 to build a network to handle electronic medical records, unified communications, and Internet access to education students, provide communication among the staff and outside agencies, and communicate with the state and parents. Unfortunately, the students that return to the residences at the end of the school day have no internet access to complete homework and learn via modern technology. The school appealed to USAC to reinstate the Wi-Fi network cards so that the students could connect, but was denied. Due to the restrictions on cellular Wi-Fi for the security staff at the residences, the Agency is paying more for the cellular service and data plans out of pocket to continue the communications to keep these students safe. Whitney Hall School used the entire 5 year C2 budget in 2015 for a firewall and 4 WAPS.
3. Lutheran Social Services of Metropolitan NY applied for E-Rate funding for the 1<sup>st</sup> time in 2016. The agency serves emotionally disturbed students at the New Life School and Early Life Universal Pre-K at 10 locations. The RFP to contract Wi-Fi network was \$158,486 and the E-Rate budget was \$127,666. The cost of cabling and installation and configuration was paid out of pocket. The school expressed concern that E-Rate rules required budget per site not on need but by entity location. The students at the New Life School (K-12) need more infrastructure support than the 3 and 4 year olds at the early childhood centers.
4. Klingberg Family Centers serve many needs of the community. The Raymond Hill School is dedicated to serving K-12 emotionally disturbed students. The agency has been leveraging E-Rate funding since 2007 to build a network to service the school and stakeholders. They built a network with Wi-Fi over the years. With the denial of C2 funding in 2013 and 2014, the Wi-Fi network has not met the needs of the students. In 2016 the school published an RFP for network upgrades and the winning bid was \$50,097, the school budget only allowed for \$10,655. Klingberg has to pay

out of pocket for installation and switches. Because of the limited budget, the school now pays out of pocket to replace broken WAPS.

5. St. Joseph School for the Deaf is located in a 1950's era former Catholic School in Bronx, NY. They currently serve 110 deaf students with 86 staff members, of whom 50 are deaf. In 2015 the school applied for E-Rate funding to upgrade the Wi-Fi network. They applied for \$16,222 for a new firewall, switch and 8 WAPS. This was not enough to extend the Wi-Fi network to another wing of the school. They were approved for an extension of the Wi-Fi cellular with data cards to the other classroom where they teach sign language, as well as cells with data for the deaf staff members to communicate via text message.
6. John P Holland Charter School is a growing charter in Paterson, NJ. In 2017 they were approved to expand a Pre-K program to grow by 80 students every year for the next 3 years. The school has not yet used E-Rate funding after being denied in 2014. The RFP response was \$164,444 but the E-Rate budget was \$45,600. Since there was not enough money to pay for the needed Wi-Fi network, they chose to lease with payments of \$21,246/year over 3 years for WAPS, switches and firewall. The school had a charge of \$45,000 for cabling and installation. John P Holland Charter School paid \$25,000 out of pocket and E-Rate paid \$20,000. John P Holland hopes to cover the lease payments in years 2 and 3 with the increased enrollment.

**Special Education Schools and Residential Treatment Schools have low student enrollment but higher staff counts to service them.**

My question to the FCC is, why should you only fund students and not users? The mission of E-Rate is to provide funding to educational institutions to deliver Internet to the users for educational purposes. By funding budgets on a per pupil amount you have excluded funding counts for teachers, social workers, security, and other staff that provide needed services to our most vulnerable students.

It does take a village to educate our students. Public schools have a very high student to staff ratio. Special education schools have a very high staff to student ratio. One size does not fit all. See below for a sample of the data.

BEN	ENTITY	Students	Staff
6020	WHITNEY HALL SCHOOL- The Children's Center of Hamden	67	70
201020	KLINGBER FAMILY CENTER	98	137
10651	ST JOSEPH SCHOOL FOR THE DEAF	110	86
11118	Leake and Watts Services, Inc.	771	415
17002853	Lutheran Social Service of Metropolitan NY	1061	422

I would like to request that the commission take a hard look at the data for Special Education and Residential schools to provide a more equitable reimbursement rate.

**EPC requires that all forms be submitted online- No paper**

I applaud the commission on the goal of streamlining the E-Rate process and requiring all forms to be submitted via EPC. This is an ambitious effort especially without thorough beta testing or proof of concept. Unfortunately, that lack of a systematic program roll-out has left the users of EPC at a disadvantage. The most debilitating failure is the Form 486 disaster. The goal of the commissions is to streamline funding and dispersants to get the funding to applicants in a timely manner. Almost 50% of my form 486 submittals went into review and were not retrievable in EPC. This system error has caused schools an unexpected delay in the use of funds. The result is that without a certified 486, schools are now required to pay the entire amount out of pocket, and the delay has jeopardized the use of SPI. Schools are struggling, they have limited or no funding for voice services and now are faced with paying 100% of internet.

I was recently at the airport awaiting my flight. The scanning software for the boarding tickets was not working. The airline tried the usual rebooting - nada. Did they make the customers wait for a reprograming of the software? NO. They got the paper copy, checked off the names, and it was business as usual. I went to pick up my glasses at Lenscrafter and the computers were down. Did they tell me to come back when the system was back up? NO. They had paper forms to track the transactions and entered the data on their time to update the system.

Klingberg Family Centers, BEN 201020, was funded for Internet access on September 15, 2017. The form 486 was filed and certified. I was notified by the school that

Lighttower had changed their SPIN number. I tried to file a SPIN change thru EPC but the system gave me an error. I filed Case # 196587 on September 21, 2017. On September 29, 2017 I got a response

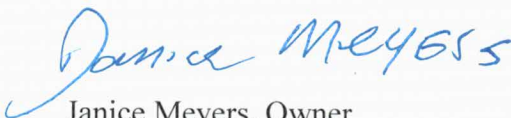
“Your case has been escalated to Customer Service Management at USAC. We are aware that there is currently an issue with FRNs not appearing for SPIN Change request for FY 2017, and are working diligently to get this issue addressed. This case will be updated as soon as we identify a solution. We appreciate your patience while we work on this issue.”

I was hoping the EPC fix on October 20, 2017 would fix the problem. I tried again to file the SPIN change in EPC and only one FRN appeared, not Lighttower. This is a change based on a SPIN change by the service provider. Why can't I file a paper SPIN change and upload it into EPC? Once approved I could begin to file BEARs to get the school much needed reimbursement.

I understand that EPC was intended to do ALL E-Rate functions online and eliminate paper forms. I believe this is not a realistic goal. Nothing is 100%. Why jeopardize school finances for the sake of a system that is not functioning up to expectations. When the student information system or the internet is down at a school, they do not stop. They use paper and pen to record the date and then back fill it. Janice Meyers Educational Consulting, LLC would like the commission to look at these unforeseen delays in EPC that cause the funds to not reach the applicants.

Janice Meyers Educational Consulting, LLC appreciates the opportunity to submit comments and data to the Commission. The E-Rate program has helped many schools and libraries to create and maintain all networks to serve students, staff, and library patron. The program is one of the most important services to the public.

Respectfully submitted ,



Janice Meyers, Owner

Janice Meyers Educational Consulting, LLC